

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of ORLY GENDER to
Remove Dalia Genger as Trustee of the
Orly Genger 1993 Trust Established on Dec. 13, 1993 by
Arie Genger, grantor.

Case No. 19-cv-9319-AKH

Hon. Alvin K. Hellerstein

Orly Genger, beneficiary of The Orly Genger 1993 Trust,
Petitioner,

v.

Dalia Genger, as trustee of The Orly Genger 1993 Trust,
and The Sagi Genger 1993 Trust,

Respondents.

NOTICE OF MOTION TO TRANSFER

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion to Transfer, dated October 14, 2019, Ron Satija, the Chapter 7 trustee appointed by the U.S. Bankruptcy Court for the Western District of Texas in Case No. 19-bk-10926-TMD in connection with the bankruptcy of petitioner Orly Genger, by and through his counsel, will move this Court, the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, at a time and date to be determined by the Court, for an Order transferring this proceeding to the Western District of Texas, pursuant to 28 U.S.C. § 1412.

Dated: New York, NY
October 14, 2019

KASOWITZ BENSON TORRES LLP

By: /s/ Michael Paul Bowen
Michael Paul Bowen
Andrew R. Kurland
1633 Broadway
New York, New York 10019
mbowen@kasowitz.com
Tel.: 212-506-1700
Fax: 212-506-1800

Counsel for Ron Satija, Chapter 7 Trustee

To (via FedEx overnight delivery):

Judith Bachman, Esq.
The Bachman Law Firm
365 S. Main Street, 2nd Floor
New City, NY 10956

Counsel for Dalia Genger

John Dellaportas, Esq.
EMMET, MARVIN & MARTIN LLP
120 Broadway, 32nd Floor
New York, NY 10271

Counsel for the Sagi Genger 1993 Trust

Spencer I. Schneider, Esq.
39 Broadway, 32nd Floor
New York, NY 10006

Counsel for Michael Oldner

Steven Riker, Esq.
Law Office of Steven Riker
One Grand Central Place, 46th Floor
New York, NY 10165

Guardian Ad Litem